

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JEROME DUPREE JR.,

Plaintiff,

v.

**CRAZY RHINO TRUCKING, LLC and
TYLER BONHAM,**

Defendant.

Case No: 2:22-cv-2590

JURY DEMANDED

NOTICE OF REMOVAL

Comes now the Defendants Crazy Rhino Trucking, LLC and Tyler Bonham, by and through the undersigned counsel, and hereby notifies the Judges of the United States District Court for the Western District of Tennessee, Western Division, the Clerk of the Circuit Court of Shelby County, Tennessee, and the Plaintiff that the action described herein and filed in the Circuit Court of Shelby County, Tennessee is removed to the United States District Court for the Western District of Tennessee, Western Division pursuant to 28 U.S.C. § 1441.

1. On July 22, 2022, Plaintiff, filed a civil action against Defendant in the Circuit Court of Shelby County, Tennessee bearing civil action CT-2986-22. Service of the Complaint and Summons was made upon the Defendants on August 21, 2022.

2. Plaintiff filed this personal injury action based upon an incident that occurred in Crockett County, Tennessee on May 18, 2022.

3. A copy of the Complaint, being all the papers served upon the Defendant, are attached as **Exhibit A** hereto.

4. Defendant seeks removal of this action to this Court pursuant to 28 U.S.C. § 1332, upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of the interest and costs. See 28 U.S.C. § 1332. The Plaintiff's Complaint seeks compensatory damages in the amount of \$1,000,000.00.

5. Plaintiff is a resident and citizen of Shelby County, Tennessee and was a citizen of the State of Tennessee at the time of the filing of this action and at the time of removal.

6. Defendant Crazy Rhino Trucking, LLC, is a Kansas limited liability company with its principle place of business in Larned, Kansas. The sole member of Crazy Rhino Trucking, LLC is Tyler Bonham, a citizen and resident of Kansas.

7. As noted above in Paragraph 4, the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

8. This notice is filed within the time prescribed by 28 U.S.C. § 1446(b).

WHEREFORE, Notice is hereby given that the said civil action is removed from the Circuit Court of Shelby County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, PLC

By /s/ W. Christopher Frulla
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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this pleading or document was served upon counsel for each of the parties by mailing postage prepaid, by delivery to the person or office of such counsel, or by electronic means, as follows:

Brandon Scott Leslie
Reaves Law Firm, PLLC
1991 Corporate Ave., Suite 310
Memphis, TN 38132
Attorney for Plaintiff

This the 8th day of September 2022.

/s/ W. Christopher Frulla